

## Fax Transmittal Memo

172

No. of Pages

1

To

2/18/94 Time

To

ED MAZZULLO

From

FRANK BLACK

Company

DOT, R+SPA

Company

ATA

Location

WASH, DC

Location

WASH, DC

Dept. Charge

Fax #

202 366-3753

Telephone #

202 366-9130

Fax #

202 626-4264

Telephone #

202 626-4130

Comments

ED -

Original  
Disposition:☐ Destroy☐ Return☐ Call for pickup

Per our conversation yesterday. Thanks.

Best regards, Frank

BSPA-1994-12666-1

P-1243

177740

MAR 15 1994

Air Transport Association

4.4 -

Frank J. Black  
Director, Cargo Services

March 8, 1994

Mr. Edward T. Mazzullo  
 Director, Office of Hazardous Materials Standards  
 Research & Special Programs Administration  
 U.S. Department of Transportation  
 400 Seventh Street, SW - DHM-10  
 Washington, D.C. 20590

Dear Mr. Mazzullo:

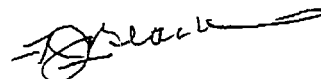
I am writing in further reference to our telephone conversation of March 7, 1994 relating to the requirement for a four foot drop test in the previous §173.6.

Any packaging for air, prior to HM-181 required a four foot drop on solid concrete test (§173.6). With the advent of HM-181, the requirement does not appear to continue to exist for ORM-D materials and limited quantities. In reviewing §173.4 Exceptions for small quantities there is a 1.8 m (5.9 feet) free drop. However, in reviewing §173.24, .24a, and §173.27 we can not seem to find reference to a free drop/drop test. If you agree with our findings members of the ATA's Dangerous Goods Board recommend that the DOT reinstate the drop test, perhaps in 49CFR §173.27. This will provide an additional measure of safety, and is of particular interest to those airlines which continue to move ORM-D materials and limited quantities domestically by the provisions of 49CFR.

Our members noted that though limited quantities differ in ICAO versus 49 CFR, ICAO's test criteria for limited quantity packaging requires a "drop test" of 1.2 meter (4 ft.). Packing Instruction 910 [specifically 910(b)] will apply to the new (to ICAO) "Consumer Commodities". Again, requiring a 1.2 meter (4 ft.) drop on solid concrete in the position most likely to cause damage.

We will appreciate your review of this recommendation and taking action to reinstate the four foot drop provisions previously contained in §173.6.

Frank J. Black



Secretary

ATA-Dangerous Goods Board